

1 **PRHLAW LLC**
 2 PAUL R. HEJMANOWSKI (#94)
 3 paul@prhllawllc.com
 4 CHARLES H. McCREA (#104)
 5 charles@prhllawllc.com
 6 520 South Fourth Street, Suite 360
 7 Las Vegas, Nevada 89101
 8 Telephone: (702) 834-6166

9 **BAUTE CROCHETIERE HARTLEY & MCCOY LLP**

10 MICHAEL J. HARTLEY (*Pro Hac Vice* to follow)
 11 mhartley@bautelaw.com
 12 COURTNEY A. PALKO (*Pro Hac Vice* to follow)
 13 cpalko@bautelaw.com
 14 777 South Figueroa Street, Suite 3800
 15 Los Angeles, California 90017
 16 Telephone: (213) 630-5000
 17 Facsimile: (213) 683-1225

18 Attorneys for Defendant
 19 Illinois National Insurance Company

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 COMMISSIONER OF INSURANCE FOR THE
 23 STATE OF NEVADA AS RECEIVER OF
 24 LEWIS & CLARK LTC RISK RETENTION
 25 GROUP, INC.,

26 Plaintiff,

27 v.

28 IRONSHORE SPECIALTY INSURANCE
 29 COMPANY; INDIAN HARBOR INSURANCE
 30 COMPANY f/k/a CATLIN INSURANCE
 31 COMPANY, INC.; ILLINOIS NATIONAL
 32 INSURANCE COMPANY; RSUI
 33 INDEMNITY COMPANY; ENDURANCE
 34 AMERICAN SPECIALTY INSURANCE
 35 COMPANY; US RE CONSULTING AGENCY
 36 SERVICES, INC., a Nevada corporation; UNI-
 37 TER UNDERWRITING MANAGEMENT
 38 CORP.; UNI-TER CLAIMS SERVICES
 39 CORP.; U.S. RE CORPORATION; LEWIS &
 40 CLARK LTC RISK RETENTION GROUP
 41 INC., a Nevada corporation; TAL PICCIONE,
 42 an individual; DOES 1 through 100, and each of
 43 them, inclusive; ROE COMPANIES 1 through
 44 100, and each of them, inclusive,

45 Defendants.

46 Case No. 2:25-cv-00789-ART-EJY
 47 Hon. Anne R. Traum

48 Notice of Removal Filed: May 6, 2025

49 **JOINT STIPULATION AND [PROPOSED]
 50 ORDER TO EXTEND DEFENDANT
 51 ILLINOIS NATIONAL INSURANCE
 52 COMPANY'S TIME TO RESPOND TO
 53 COMPLAINT BY 30 DAYS**

54 **(FIRST REQUEST)**

1 Plaintiff Commissioner of Insurance for the State of Nevada (“Plaintiff”) and Defendant
 2 Illinois National Insurance Company (“Illinois National”) (collectively the “Parties”) hereby
 3 stipulate, by and through their respective counsel of record, and subject to the Court’s approval, as
 4 follows:

5
 6 1. Plaintiff filed the Complaint in Nevada state court on December 30, 2024 (ECF #1-1)
 7 and Illinois National was served with the Complaint on April 21, 2025.

8 2. A notice of removal was filed in this action on May 6, 2025 (ECF #1).
 9 3. Illinois National’s deadline to respond to the Complaint is May 13, 2025. Fed. R. Civ.
 10 Proc. 81(c)(2)(C) (seven days after notice of removal is filed).

11 4. Illinois National requires additional time to prepare its response to the Complaint.
 12 5. The Parties therefore agree, subject to the Court’s approval, to extend the deadline for
 13 Illinois National to answer, move to dismiss, or otherwise respond to the Complaint by thirty (30)
 14 days, to June 12, 2025.

15 6. The Parties agree that good cause exists for this extension.
 16 7. This is Illinois National’s first requested extension.
 17 8. By entering into this stipulation Plaintiff does not waive, or intend to waive, any rights
 18 in this matter, including, without limitation, any and all rights related to Plaintiff’s ability to seek
 19 remand of this matter to Eighth Judicial District Court (“State Court”) in Nevada, pursuant to 28
 20 U.S.C. section 1447, or any other right or remedy, which Plaintiff expressly reserves.

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval, that Illinois National's deadline to answer, move to dismiss, or otherwise respond to the Complaint is extended to June 12, 2025.

DATED: May 12, 2025

WIRTHLIN & VERLAINE

DATED: May 12, 2025

By: /s/ Brenoch Wirthlin
Brenoch R. Wirthlin
Attorneys for Plaintiff Commissioner of Insurance for the
State of Nevada
PRHLAW LLC
BAUTE CROCHETIERE HARTLEY & McCOY LLP

By: /s/ Charles McCrea
Charles McCrea
Attorneys for Defendant Illinois National Insurance
Company

IT IS SO ORDERED:

Elyna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

DATED: May 12, 2025